## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK MAIN OFFICE (SYRACUSE)

RACHEL COLANGELO and KATHLEEN PARADOWSKI, individually and on behalf of a class of similarly situated individuals,

Plaintiff,

v.

CHAMPION PETFOODS USA INC. and CHAMPION PETFOODS LP,

Defendants.

CIVIL ACTION NO.: 6:18-cv-01228-LEK-ML

NOTICE OF DEFENDANTS' MOTION TO **EXCLUDE PLAINTIFF'S EXPERT** WITNESS BRUCE G. SILVERMAN

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated April 15, 2021, and the Declaration of David A. Coulson in Support of Defendants' Motion to Exclude Plaintiff's Expert Witness Bruce G. Silverman, and the exhibits annexed thereto, Defendants Champion Petfoods USA Inc. and Champion Petfoods LP (collectively, "Champion") hereby move this Court for an order excluding the opinions and testimony of Bruce G. Silverman, and for such other and further relief as the Court deems appropriate.

DATED: April 15, 2021 GREENBERG TRAURIG, LLP

By: /s/ David A. Coulson

David A. Coulson, Esq. (pro hac vice) Jared R. Kessler, Esq. (pro hac vice) Robert S. Galbo, Esq. (pro hac vice) Elisa H. Baca, Esq. (pro hac vice) 333 SE 2nd Avenue, Suite 4400

Miami, FL 33131

Telephone: 305-579-0754 Facsimile: 305-579-0500 Email: coulsond@gtlaw.com kesslerj@gtlaw.com

galbor@gtlaw.com bacae@gtlaw.com

Rick L. Shackelford, Esq. (pro hac vice) 1840 Century Park East, Suite 1900 Los Angeles, CA 90067

Telephone: 310-586-3878 Facsimile: 310-586-7800

Email: shackelfordr@gtlaw.com

Cynthia Neidl, Esq. (513737) 54 State Street Albany, NY 12207 Telephone: 518-689-1435

Facsimile: 518-689-1499 Email: neidlc@gtlaw.com

Attorneys for Defendants Champion Petfoods USA Inc. and Champion Petfoods LP